

STATE OF TENNESSEE

Office of the Attorney General



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OFFICE OF THE
EXECUTIVE SECRETARY

JOHN KNOX WALKER
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March 6, 1998

David Waddell,
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37143-0505

Re: BellSouth Telecommunications, Inc.'s Entry Into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of the
Telecommunications Act of 1996
Docket No. 97-00309

Dear Mr. Waddell:

Please be advised that the Consumer Advocate Division is submitting two (2) discovery request sets. One set is for BellSouth and a second generic set for the companies on the attached page.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Vincent Williams".

L. Vincent Williams

cc: parties of record

The same discovery request was issued to:

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Hyperion Telecommunications Corporation

MCI Telecommunications Corporation

Time Warner Communications of the Mid-South L.P.

ACSI

Brooks Fiber

ICG

LCI International

NextLink

TCG-MidSouth, Inc.

LDDS WorldCom

AT&T Communications of the South Central States, Inc.

The Southeast Competitive Carrier Association (SECCA)

OFFICE OF THE
EXECUTIVE SECRETARY

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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FILED IN
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IN RE: BellSouth Telecommunications, Inc.'s)
Entry Into Long Distance (InterLATA))
Service in Tennessee Pursuant to Section 271)
of the Telecommunications Act of 1996

OFFICE OF THE
EXECUTIVE SECRETARY
Docket No. 97-06309

CONSUMER ADVOCATE'S SECOND DISCOVERIES REQUEST OF BELL SOUTH
TELECOMMUNICATIONS INC.

To: BellSouth Telecommunications, Inc.
C/O Mr. Guy Hicks, General Counsel.
Suite 2101
333 Commerce Street
Nashville, Tennessee 37201-3300

Please reply to the discovery requests provided herein by: 1) answering under oath these discovery requests and serving your answers upon Consumer Advocate L. Vincent Williams or his designee at 2nd Floor, Cordell Hull Building, 425 5th Avenue North, Nashville, TN 37243; and 2) providing clear copies of the documents and things specified herein. The answer to each item should begin with the restatement of the question and should conclude with the signature and title of the person(s) responsible for answering that particular question.

Please be aware that this discovery is continuing in nature and requires BellSouth Telecommunications, Inc. to provide supplemental responses if additional or different information is obtained or as may be necessary from time to time to provide the Consumer Advocate with a full, complete and current answer or response until the hearing in this docket.

INSTRUCTIONS AND DEFINITIONS

The terms "you", "your" and "yours" as used herein refer to the addressee party of these Interrogatories as well as any and all agents, employees, representatives, experts, and other persons acting or purporting to act on your behalf.

If, for any reason, you are unable to answer a discovery request fully, submit as much information as is available and explain why your answer is incomplete. If precise information cannot be supplied, submit 1) your best estimate, so identified, and your basis for the estimate and 2) such information available to you as comes closest to providing the information requested. If you have reason to believe that other sources of more complete and accurate information exist, identify those sources.

If a document exists in different versions, including any dissimilar copies (such as a duplicate with handwritten notes on one copy, or electronic or computer versions), each version shall be treated as a different document and each must be identified and produced.

If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

These discovery requests are to be interpreted broadly to fulfill the benefit of full discovery. To assist you in providing full and complete discovery, Petitioner provides the following definitional guidelines:

1. The term "person" or "persons" as used herein refers to any natural person, corporation, firm, company, sole proprietorship, partnership, business, unincorporated association, or other entity of any sort whatsoever. Where a company or organization is the party being served all responses must include the company's response. Moreover, the company's designated person for

responding must assure that the company provides complete answers. *A complete answer must provide a response which includes all matters known or reasonably available to the company.* The response is not to be limited to the knowledge of the individual responding.

2. The term "document" as used herein has the full extent of its possible meaning in accordance with law, including any written, printed, typed, drawn, filmed, taped, or recorded in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, photograph, tape recording, computer disk or record, or other data compilation in any form. This definition shall also mean all copies of documents by whatever means made including any nonidentical versions or drafts (whether different from the original because of handwritten notes, underlining, highlighting, or otherwise).

3. The terms "and" and "or" shall be construed conjunctively or disjunctively as necessary to include any information that might otherwise be construed outside the scope of these requests.

4. References to the masculine shall include the feminine, the singular shall include the plural, and vice versa.

5. The term "communication" means any transmission of information by oral, graphic, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, or otherwise.

6. Each discovery answer should begin by restating the item requested.

7. Where a number of sheets are required to fully answer an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 1 of 6.

8. If any information requested is not furnished as requested, please state where and how the information may be obtained or extracted, the person or persons having knowledge of the procedure and the person instructing that the information be excluded.

9. Please respond fully to the request even if it has been partially requested or supplied in prior filings or dockets. The information and Rule 33 and 34 information shall be submitted to this office at 2nd Floor, Cordell Hull Building , 425 5th Avenue North, Nashville, TN 37243-0500. If there is a need for clarification of any attached request, please contact me at (615) 741-8700 before furnishing the response.

10. The terms “provide” and “produce” refer to the production of documents and things in accordance with the Rules of Civil Procedure.

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1. In response to the Consumer Advocate Division's first discovery request Item No.3

BellSouth responded in part:

When January's 63.7% raw flow-through is adjusted for the CLEC-caused order errors, which were 80.1 %, the adjusted flow-through rate for January is 90.5%. This rate is comparable to the combined **retail flow-through rates for residence and business orders**. (Emphasis added.)

What is the retail flow-through rate individually for residence and business orders as indicated in the response to Item No. 3? (Please produce supporting documentation.)

2. Identify and provide copies of all reports, analysis, and correspondence that BellSouth provides to the CLECs concerning errors that the CLECs' employees make in orders submitted to BST so that the CLEC can take corrective action.
3. On the attachment to BellSouth's response to the Consumer Advocate Division's first discovery request Item 3, an analysis of the flow-through of CLEC orders for January 1998 was provided.
 - (a) Please indicate which of the CLECs are operating in Tennessee.
 - (b) For each of the CLECs operating in Tennessee:

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- i. Identify the number or order and provide the flow-through analysis as presented on the Attachment in response to Item 3 that relate to the resale of BellSouth service.
 - ii. Identify the number or order and provide the flow-through analysis as presented on the Attachment in response to Item 3 that relate to the provision of service through the use of BellSouth unbundled network elements; and
 - iii. Identify the number or order and provide the flow-through analysis as presented on the Attachment in response to Item 3 that relate to the provision of service through the use of CLEC facilities.
4. In response to Item 5 of the Consumer Advocate Division's first discovery request BellSouth responded in part:

BellSouth representative who in puts an order in RNS, DOE, or SONGS never knows if his or her orders are rejected. BellSouth's rejected retail orders are handled by employees in BellSouth's Trouble Resolution and Error Corrections Centers. Likewise, CLECs' rejected retail orders are handled by employees at the Local Carrier Service Centers (LCSCs). They attempt to correct the orders, but if they are unable to do so, they notify the customers (the CLECs) via mechanical fax, so that the CLEC can obtain the correct information from their end user customers.

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- (a) The response indicates that if the employees at the LCSC can't correct a CLEC order they notify the CLEC by fax. Please explain each the type of error that occurs that the employees of the LCSC employees can't correct.
- (b) Please explain how operation and function of the Local Carrier Service Centers differs from the Trouble Resolution and Error Corrections Centers.
- (c) Identify the average amount of time between the time that a BST order first rejected and the time that end user customer is contacted where such contact is required.
(Provide supporting documentation)
- (d) What is the average time between the time that a CLEC order is first rejected and the time that the CLEC is notified when the order can not be corrected by LCSC employees? (Provide supporting documentation.)
- (e) What is the average amount of time between the point that a CLEC order is first rejected and the time that the LCSC employees corrects the order where the order can

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be corrected by the LCSC employees? (Provide supporting documentation.)

(f) What is the average amount of time between the time that a BST retail order is rejected and the order is corrected by the Trouble Resolution and Error Corrections Centers employees? (Provide supporting documentation.)

(g) Are BellSouth's Trouble Resolution and Error Corrections Centers part of BellSouth's retail operations division or part of BellSouth's wholesale division?

5. In response to Consumer Advocate Division first discovery request Item 6(First), BellSouth responded:

The CLECs have requested that notification of rejected orders be delivered to them via EDI, and BellSouth began implementing electronic notification in November 1997, as described below. There currently are no industry standards for providing electronic reject or error notification. BellSouth's current EDI implementation complies with the national standards established by the industry's Ordering and Billing Forum in TCIF version 6.0. However, neither this version--nor version 7.0, which is scheduled to be implemented on March 16, 1998 -- provides standards for returning information to the CLEC for

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orders rejected because of errors detected by LEO, LESOG, or SOCS. Despite the lack of industry standards, BellSouth has already developed and implemented the first of a two-stage process to provide error rejection electronically. This mechanism returns an error code and an explanation of the error to CLECs using the EDI interface. This initial stage of this automated reject capability, which was tested by MCI, became operational in November 1997. This stage contains 68 percent of the total electronic rejects to be implemented. The remaining error types are being addressed in the second phase of this implementation. To facilitate this development in the absence of industry standards, BellSouth hosted a conference on October 30 and 31, 1997 for all CLECs using EDI. This conference was necessary because of the nature of EDI, which requires complementary programming on both BellSouth's and the CLECs' side of the EDI interface. The CLECs and BellSouth agreed on the specifications required for the remaining capability which all parties would implement on their respective sides of the EDI interface. The second phase of the reject capability is currently scheduled to be operational on March 16, 1998. Until the second phase is implemented, rejects not included in the 68 percent of error types currently handled by EDI are routed to the Local Carrier Service Center, where they can be corrected by the LCSC or faxed to the CLECs if necessary.

(a.) Identify by name and date the CLECs that have requested that notification of rejected orders be delivered to them via EDI.

(b.) BellSouth states:

This initial stage of this automated reject capability ,

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which was tested by MCI, became operational in
November 1997.

- i. Identify CLECs other than MCI that have tested this initial stage.
- ii. Identify by name all CLEC's operating in Tennessee that are using this initial stage. For each such CLEC identify the date that each began using this initial stage.

(c.) BellSouth states:

The CLECs and BellSouth agreed on the specifications required for the remaining capability which all parties would implement on their respective sides of the EDI interface. The second phase of the reject capability is currently scheduled to be operational on March 16, 1998.

- i. Identify all other CLECs authorized to operate in Tennessee that agreed on the specifications required for the remaining capability which all parties would implement on their respective pieces of the EDI interface. (Provide supporting documentation of the agreement.)
- ii. Identify all CLECs authorized to operate in Tennessee that will begin using

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the second phase capability on March 16, 1998. (Provide documentation.)

- (d.) BellSouth states at one point: "This stage contains 68 percent of the **total electronic rejects** to be implemented." Then later states: "Until the second phase is implemented, rejects not included in the 68 percent of **error types** currently handled by EDI are routed to the Local Carrier Service Center, where they can be corrected by the LCSC or faxed to the CLECs if necessary." (Emphasis added.)

Please clarify. Does the first stage address 68 percent of the types of errors that cause rejects or the types of errors that result in 68 percent of the CLEC order rejections?

- (e.) Based on the response to Item No. 3 of the Consumer Advocate Division first discovery request, for each CLEC identify the number of errors that would have been reported to the CLECs by EDI, if this first stage had been implemented.
- (f.) Is it correct to interpret BellSouth's response to Item No. 6 of the Consumer

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Advocate's first discovery request in this docket as meaning that presently BellSouth can not notify CLECs electronically of the types of errors that result in 32% of the order rejections?

- (g.) Identify the error types that are included in the 32 % that BellSouth can not notify CLEC's electronically.

6. In response to Item 6 (Second) of the Consumer Advocate Division's first discovery request BellSouth stated:

BellSouth objects to this request as phrased. Subject to this objection, BellSouth denies that it fails to provides competitors with information about the status of their orders in substantially the same manner as it provide for itself, **where there are retail analogs**. (Emphasis added.)

- (a.) Please explain why BellSouth qualified it denial by including the phrase, "where there are retail analogs." What is the significance of this phrase?

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7. In response to Item 11 of the Consumer Advocate Division's first discovery request

BellSouth responded in part:

Once an order is pending in the Service Order Control System (SOCS), certain situations can arise that result in a "jeopardy" condition. A jeopardy occurs when it appears that the previously established due date for the order may not or will not be met. Jeopardy notifications, often called "jeopardies," therefore advise CLECs when an order is not expected to be completed by the due date. BellSouth currently notifies CLECs of service jeopardies primarily by telephone, and less frequently, by facsimile, which is substantially the same time and manner it does for itself.

- (a.) What per cent of the notifications to the CLECs are provided by telephone and what percentage of the notifications are by facsimile? (Produce supporting documentation.)
- (b.) What is the average time for providing the CLECs of a jeopardy notification once it is determined that the previously established due date for an order may not or will not be met? (Provide supporting documentation.)
- (c.) What is the average time for notifying a BellSouth retail customer once it is

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determined that the previously established due date for an order may not or will not
be met? (Provide supporting documentation.)

- (d.) Please define the term "substantially the same time" as used in this response?
- (e.) For each month of 1997 and 1998 identify the per cent of BellSouth retail orders that
were subject to a jeopardy notification. (Provide documentation.)
- (f.) For each month of 1997 and 1998 identify the per cent of CLEC orders that were
subject to a jeopardy notification. (Provide documentation.)
- (g.) For each month of 1997 and 1998 identify the per cent of CLEC orders that were
subject to a jeopardy notification for delays caused by BellSouth. (Provide
documentation.)
- (h.) For each month of 1997 and 1998 identify the per cent of BST retail order that were
completed by the initial established due date. If data is available segregate the

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response in to work orders for:

- i. Residential service, and
- ii. Business service.

(Provide supporting documentation.)

- (i) For each month of 1997 and 1998 identify the per cent of each CLEC, orders which were completed by the initial established due date. If data is available provide the information requested for each of the following categories of request.

- i. CLEC requests for the resale of service.
- ii. CLEC requests where service is to be provided using unbundled network elements.
- iii. CLEC requests where service is to be provided using CLEC facilities.

(Provide supporting documentation.)

- (j) On the average, how much in advance of the scheduled cut over date are CLECs informed that BellSouth will be unable to meet the scheduled cut over date. (Provide supporting documentation.)

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- (j) On the average, how much in advance of the scheduled cut over date is BellSouth's retail operation informed that the company will be unable to meet the scheduled cut over date. (Provide supporting documentation.)
 - (k) On the average, how much in advance of the scheduled cut over date are BellSouth's retail customers informed that the company will be unable to meet the scheduled cut over date. (Provide supporting documentation.)
8. In response to Item 15 of the Consumer Advocate Division's first discovery request BellSouth stated:
- In response to Item no. 14, BellSouth admitted that it does not integrate the LENS pre-ordering and the EDI ordering interfaces for CLECs. Integration of the pre-ordering interfaces is the responsibility of each CLEC, if it desires integration; it is not BellSouth's responsibility. However, since the time of the Louisiana filing, and updated GCI specification for LENS has been made available to interested CLECs. The EC-LITE machine-to-machine pre-ordering interface, which may also be integrated with EDI, became available on December 31, 1997.
- (a.) Provide copies of correspondence to the CLECs authorized to operate in Tennessee which notified such CLECs of the updated GCI specification for LENS.

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- (b.) Provide copies of correspondence both to and from CLECs operating in Tennessee concerning the updated GCI and the integration of the pre-ordering interfaces since BellSouth's filing to provide InterLATA service in Louisiana.
- (c.) Identify any CLECs operating in Tennessee that have attempted to integrate the pre-ordering interfaces.
- (d.) Provide copies of correspondence both to and from CLECs concerning the EC-LITE machine-to-machine pre-ordering interface, which became available on December 31, 1997.
- (e.) Identify all CLECs operating in Tennessee that are using the EC-LITE machine-to-machine pre-ordering interface.
- (f.) Identify any other CLECs operating in Tennessee that have attempted to utilize the EC-LITE machine-to-machine pre-ordering interface but have not been successful.

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9. On page 4 his Confidential Affidavit Mr. Gary M. Wright takes the position that Sprint PCS and PowerTel are providing facility-based wireless local exchange service to both business and residential customers utilizing FCC-licensed PCS spectrum.
- (a) For each BellSouth Tennessee exchange where Sprint PCS is providing local exchange service identify:
- i. the number of residential Customers being provided local exchange service by Sprint PCS,
 - ii. the monthly recurring and/or usage rate for Sprint PCS' residential customers,
 - iii. the monthly recurring and/or usage rate for BellSouth residential customers, and
 - iv. the average toll revenue per minute, and.

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v. the average local exchange and toll minutes of use for BellSouth residential customers. (If the average local exchange minutes of use for BellSouth residential customers is not available by exchange, provide the average local exchange minutes of use for BellSouth Tennessee residential customer in total.)

vi. the number of customers replacing BellSouth's local exchange service with Sprint PSC.

vii. please admit or deny:

BellSouth does not know of any local exchange customer who has replaced BellSouth's traditional facilities based local exchange service in Tennessee entirely with Sprint PSC.

(b) For each BellSouth Tennessee exchange where PowerTel is providing local exchange service identify:

i. the number of residential Customers being provided local exchange service by PowerTel,

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- ii. the monthly recurring and/or usage rate for PowerTel's residential customers,
- iii. the monthly recurring and/or usage rate for BellSouth residential customers,
- iv. the average toll revenue per minute, and.
- v. the average local exchange and toll minutes of use for BellSouth residential customers. (If the average local exchange minutes of use for BellSouth residential customers is not available by exchange, provide the average local exchange minutes of use for BellSouth Tennessee residential customer in total.)
- vi. the number of customers replacing BellSouth's local exchange service with PowerTel.
- vii. please admit or deny:
BellSouth does not know of any local exchange customer who has replaced BellSouth's traditional facilities based local exchange service in Tennessee entirely with PowerTel.

(c) On page 54 Mr. Wright states Sprint PCS basic service package:

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. . . . competes with traditional wireline basic local
exchange service offerings for a significant number of
low-use Sprint PCS residential and business
customers.

- i. Define the term “**low-use residential**” customer as used by Mr. Wright.
- ii. What is the number of local exchange minutes that would qualify a
residential customer as a “low-use residential” customer.
- iii. Identify the number of BellSouth customers in the area served by Sprint PCS
that qualify as “low-use residential” customers.
- iv. Provide copies of all analysis, studies, research papers, documents etc. in
BellSouth's, its subsidiaries', or affiliates' possession that support Mr.
Wright's assertion that the Sprint PCS basic service package competes with
traditional wireline basic local exchange service for a **significant** number of
“low-use residential” customers.

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- (d) On page 56 of his affidavit Mr. Wright states that PowerTel PCS basic service package:

. . . . competes with traditional wireline basic local exchange service offering for a significant number of low-use residential and business customers.

- i. Identify the number of BellSouth customers in the area served by PowerTel that qualify as "low-use residential" customers.
- ii. Provide copies of all analysis, studies, research papers, etc. in BellSouth, its subsidiaries, or affiliates possession that support Mr. Wright's assertion that the Power Tel PCS basic service package competes with traditional wireline basic local exchange service for a **significant** number of "low-use residential" customers.

10. In response to Item 30, of the Consumer Advocates First Discovery Request, BellSouth provided a copy of its proposed long distance tariffs. These proposed tariffs show rates for:

Residential Message Telecommunications Service - Page 33

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Business Message Telecommunications Service - Page 34

Residential Travel Card Service- Proprietary - Page 35

Business Travel Card Service - Proprietary - Page 37

Residential Operator Services - Page 39

Business Operator Services - Page 41

Aggregator Operator Services - Page 43

- (a) While the discovery request was for BellSouth to identify its MTS traffic rates, BellSouth provided a copy of proposed tariffs. Is this a complete copy of all BellSouth's proposed long distance tariffs?
 - (b) Does BellSouth intend to offer WATS, WATS type services, and optional calling plans similar to the InterLATA optional calling plans presently being offered by AT&T, MCI, and Sprint.
 - (c) If the answer to (b) is yes, please identify other optional plans that BellSouth intends to offer and identify the proposed rates for such service.
11. At the technical conference on March 5, 1998 a BellSouth representative explained that the SONGs system was not made available to CLECs, that the system was operating on obsolete

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computes, and that a new system is being development for deployment in 1998.

- (a) Will the replacement system be made available to CLECs? If not, please give BellSouth's reasons.
 - (b.) What is the name of the new system?
 - (c) How will the new system differ from the existing system? (Provide all documents describing in any way the new and old systems including but not limited to copies of the existing screens and the screens that will tentatively be available in the new system, and all reports, planning documents, etc. that describe the new system.)
12. (a) Please explain how BellSouth's retail operation retrieves information on pending orders?
- (b) Please explain how CLECs retrieve information on pending orders?
- (c) If the process used by BellSouth's retail operation to retrieve information on pending

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orders is different than the process required to be used by the CLECs, please explain.

13. Provide an analysis of the errors in orders placed by BellSouth customer representatives in the same format as that provided in response to Item No. 3 of the Consumer Advocate Division's first discovery request. The analysis should show for November 1997, and January 1998, and all other months of 1997 and 1998 for which data is available to provide the number of errors of each type identified in response to Item No. 3.
14. Please explain any differences between the procedure used by BellSouth's retail division to determine the availability of facilities and the procedure required to be used by CLECs to determine the availability of facilities.

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(INTERLATA) SERVICES IN TENNESSEE PURSUANT TO SECTION 271 OF THE
TELECOMMUNICATIONS ACT OF 1996

TENNESSEE REGULATORY AUTHORITY DOCKET 97-00309

Certificate of Service

I hereby certify that on March 6, 1998, a copy of the foregoing document was served on the parties of record, vial facsimile, hand delivery, overnight or U.S. Mail, postage pre-paid.

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L. Vincent Williams

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

REGULATORY AUTH.
'98 MAR 6 AM 11 56

IN RE: BellSouth Telecommunications, Inc.'s)
Entry Into Long Distance (InterLATA))
Service in Tennessee Pursuant to Section 271)
of the Telecommunications Act of 1996

DOCKET NO. 97-00309
OFFICE OF THE
EXECUTIVE SECRETARY

CONSUMER ADVOCATE'S FIRST DISCOVERIES REQUEST OF AT&T
COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

To: AT&T Communications of the South Central States, Inc.
C/O James Lamoureux, Esquire
AT&T Communications of the South Central States, Inc.
1200 Peachtree St., NE
Atlanta, GA 30309

Please reply to the discovery requests provided herein by: 1) answering under oath these discovery requests and serving your answers upon Consumer Advocate L. Vincent Williams or his designee at 2nd Floor, Cordell Hull Building, 425 5th Avenue North, Nashville, TN 37243; and 2) providing clear copies of the documents and things specified herein. The answer to each item should begin with the restatement of the question and should conclude with the signature and title of the person(s) responsible for answering that particular question.

Please be aware that this discovery is continuing in nature and requires AT&T to provide supplemental responses if additional or different information is obtained or as may be necessary from time to time to provide the Consumer Advocate with a full, complete and current answer or response until the hearing in this docket.

INSTRUCTIONS AND DEFINITIONS

The terms "you", "your" and "yours" as used herein refer to the addressee party of these Interrogatories as well as any and all agents, employees, representatives, experts, and other persons acting or purporting to act on your behalf.

If, for any reason, you are unable to answer a discovery request fully, submit as much information as is available and explain why your answer is incomplete. If precise information cannot be supplied, submit 1) your best estimate, so identified, and your basis for the estimate and 2) such information available to you as comes closest to providing the information requested. If you have reason to believe that other sources of more complete and accurate information exist, identify those sources.

If a document exists in different versions, including any dissimilar copies (such as a duplicate with handwritten notes on one copy, or electronic or computer versions), each version shall be treated as a different document and each must be identified and produced.

If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

These discovery requests are to be interpreted broadly to fulfill the benefit of full discovery. To assist you in providing full and complete discovery, Petitioner provides the following definitional guidelines:

1. The term "person" or "persons" as used herein refers to any natural person, corporation, firm, company, sole proprietorship, partnership, business, unincorporated association, or other entity of any sort whatsoever. Where a company or organization is the party being served all responses must include the company's response. Moreover, the company's designated person for

responding must assure that the company provides complete answers. *A complete answer must provide a response which includes all matters known or reasonably available to the company.* The response is not to be limited to the knowledge of the individual responding.

2. The term "document" as used herein has the full extent of its possible meaning in accordance with law, including any written, printed, typed, drawn, filmed, taped, or recorded in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, photograph, tape recording, computer disk or record, or other data compilation in any form. This definition shall also mean all copies of documents by whatever means made including any nonidentical versions or drafts (whether different from the original because of handwritten notes, underlining, highlighting, or otherwise).

3. The terms "and" and "or" shall be construed conjunctively or disjunctively as necessary to include any information that might otherwise be construed outside the scope of these requests.

4. References to the masculine shall include the feminine, the singular shall include the plural, and vice versa.

5. The term "communication" means any transmission of information by oral, graphic, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, or otherwise.

6. Each discovery answer should begin by restating the item requested.

7. Where a number of sheets are required to fully answer an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 1 of 6.

8. If any information requested is not furnished as requested, please state where and how the information may be obtained or extracted, the person or persons having knowledge of the procedure and the person instructing that the information be excluded.

9. Please respond fully to the request even if it has been partially requested or supplied in prior filings or dockets. The information and Rule 33 and 34 information shall be submitted to this office at 2nd Floor, Cordell Hull Building , 425 5th Avenue North, Nashville, TN 37243-0500. If there is a need for clarification of any attached request, please contact me at (615) 741-8700 before furnishing the response.

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3. Provide copies of any analysis, reports, and/or correspondence provided to AT&T by BellSouth concerning the number and type of error made by AT&T employees that resulted in rejection of the AT&T's orders.
4. In response to Item 11 of the Consumer Advocate Division's first discovery request BellSouth responded in part:

Once an order is pending in the Service Order Control System (SOCS), certain situations can arise that result in a "jeopardy" condition. A jeopardy occurs when it appears that the previously established due date for the order may not or will not be met. Jeopardy notifications, often called "jeopardies," therefore advise CLECs when an order is not expected to be completed by the due date. BellSouth currently notifies CLECs of service jeopardies primarily by telephone, and less frequently, by facsimile, which is substantially the same time and manner it does for itself.

- (a.) Does AT&T agree with BellSouth's response? If not, please explain. Please be specific and provide any available documentation to support you position.
- (b.) Provide copies of all analysis in AT&T's possession concerning the number of or per cent of times BellSouth meets and the number of or per cent of times BellSouth fails

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to meet the initial established due date. If available provide the breakdown as
following service categories.

- i. AT&T's use of BellSouth's unbundled network elements,
- ii. use of AT&T's own facilities, and
- iii. AT&T's resale of BellSouth's service.

5. Provide all analysis in AT&T's possession concerning the amount of time that AT&T's
customers are out of service during cut over from BellSouth, where service is being furnished
by:

- i. AT&T's use of BellSouth's unbundled network elements,
- ii. use of AT&T's own facilities, and
- iii. AT&T's resale of BellSouth's service.

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6. In response to the Consumer Advocate's First Discover Request Item 3, BellSouth responded:

See Response to Item 2. BellSouth reiterates that it has supplied information regarding submission of orders via the EDI interface in the Local Exchange Order (LEO) Guidelines. The current edition has been available to CLECs for at least 6 months, but the first edition was made available in April, 1997. The LEO Guide was attached to the Direct Testimony of Gloria Calhoun as Exhibit GC-26 and to the Affidavit of William Stacy as Exhibit WNS-45. While BellSouth had previously provided much of this information (most of it is contained in the LEO Guide), on January 30, 1998, a comprehensive package of edits (including the Local Exchange Ordering (LEO) and Local Exchange Service Order Generator (LESOG) edits and Rejects requirements, and a disk of the Service Order Edit Routine (SOER) edits used by the Service Order Control System (SOCS) was delivered to CLECs and notice of the availability of these edits was put on BellSouth's CLEC web site.

Regarding the subject of "flow-through," attached is the January flow-through report. This report shows the flow-through rate of all CLECs using LENS or EDI for electronic ordering for the month of January 1998. "Raw flow-through" includes orders rejected for errors, many of which are CLEC input errors.

"Adjusted flow-through" excluded rejected orders, and shows what the systems are capable of flowing through mechanically. Also attached are CLEC order errors analyses, showing the types of order errors observed during an examination of every electronic order placed for three days in November and September.

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The January flow-through report shows that two CLECs, CLECs L and P, which placed 659 and 332 orders respectively electronically in January alone, achieved non-adjusted flow-through rates of 98.0% and 96.1%, showing that high flow-through with trained service representatives is indeed quite possible using the electronic interfaces BellSouth provides for CLECs. This report's results indicate that January's raw, non-adjusted flow-through rate was 63.3%, a 150% improvement over July's raw flow-through rate of 25%. When January's 63.6% raw flow-through is adjusted for the CLEC-caused order errors, which were 80.1%, the adjusted flow-through rate for January is 90.5%. This rate is comparable to the combined retail flow-through rates for residence and business orders.

The second set of documents attached in response to this Request reflect that BellSouth conducted analyses of order flow-through and error which caused orders to be rejected taking a sample of all electronic orders placed during 1 day in September and 2 days in November, to examine each order to determine which errors are indeed CLEC order errors and BellSouth's system errors. The report validate that CLECs' order error rates ranged from 27% to 88%, also indicating that lower error rates are indeed achievable November's analysis of electronic order errors shows that SOER (errors used by SOCS) errors accounted for 45% of the CLECs' errors. These SOER errors include many omitted or incorrect USOCs on the service order. This is in spite of the fact that BellSouth has provided CLECs the required USOCs in the Local Exchange Ordering Guide, Volumes 2 and 3, which CLECs have had since April, 1997, and again in BellSouth's CLEC web site. Another error is improper formatting of data on the service order (no space after a comma, for example). As stated earlier, this information also was provided in the three-volume Local Exchange Ordering Guide. The second largest CLEC error category was address errors, which accounted for 26.7% of the CLEC errors. BellSouth has provided CLECs the information they need to perform correct order processing, as demonstrated by the two CLECs

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mentioned earlier, who are achieving non-adjusted flow-through rates of 98% and 96%.

BellSouth also provide ongoing assistance to CLECs to help them decrease their order errors and rejects, and therefore increase their order flow-through. BellSouth continues to conduct regularly scheduled training classes on the Electronic Interfaces - BellSouth trained 383 CLEC attendees in 1997's Electronic Interfaces classes. In addition to the documentation previously listed, BellSouth has provided the LENS User Guide, the Trouble Analysis Facilitation Interface (TAFI) User Guide, the EDI-PC Harbinger Training Manual, as well as specifications for CGI-LENS and TAFI. BellSouth also provides a team of people who can provide on-site assistance to CLECs upon request (at their locations), to help them with their use and understanding of the Electronic Interfaces. Finally, BellSouth has provided to the CLECs electronic access to USOCs, as well as the Rejects Requirements binder developed by BellSouth and agreed upon by the CLEC EDI users.

- (a.) Does AT&T agree with BellSouth's response? If not explain. Please be specific and provide supporting documentation.

7. In response to Consumer Advocate Division first discovery request Item 6(First), BellSouth responded:

The CLECs have requested that notification of rejected orders be delivered to them via EDI, and BellSouth began implementing electronic notification in November 1997, as described below. There

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currently are no industry standards for providing electronic reject or error notification. BellSouth's current EDI implementation complies with the national standards established by the industry's Ordering and Billing Forum in TCIF version 6.0. However, neither this version-- nor version 7.0, which is scheduled to be implemented on March 16, 1998 -- provides standards for returning information to the CLEC for orders rejected because of errors detected by LEO, LESOG, or SOCS. Despite the lack of industry standards, BellSouth has already developed and implemented the first of a two-stage process to provide error rejection electronically. This mechanism returns an error code and an explanation of the error to CLECs using the EDI interface. This initial stage of this automated reject capability, which was tested by MCI, became operational in November 1997. This stage contains 68 percent of the total electronic rejects to be implemented. The remaining error types are being addressed in the second phase of this implementation. To facility this development in the absence of industry standards, BellSouth hosted a conference on October 30 and 31, 1997 for all CLECs using EDI. This conference was necessary because of the nature of EDI, which requires complementary programming on both BellSouth's and the CLECs' side of the EDI interface. The CLECs and BellSouth agreed on the specifications required for the remaining capability which all parties would implement on their respective sides of the EDI interface. The second phase of the reject capability is currently schedule to be operational on March 16, 1998. Until the second phase is implemented, rejects not included in the 68 percent of error types currently handled by EDI are routed to the Local Carrier Service Center, where they can be corrected by the LCSC or faxed to the CLECs if necessary.

- (a.) Has AT&T agreed to the specifications required for the remaining capability will implement on their respective sides of the EDI interface.

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- (b). Has AT&T tested the initial stage?
 - (c). If AT&T is using this initial stage, give the date that AT&T's use began.
 - (d). If AT&T is not using the initial stage, please explain.
 - (e). Does AT&T plan to begin using the final stage on March 16, 1998? If not please explain.
 - (f). Please identify any statements made by BellSouth in this response with which AT&T disagrees.
8. In response to Item 7 of the Consumer Advocate Division's first discovery request BellSouth stated:

(a) BellSouth object to this request as phrased. BellSouth does not believe there are any deficiencies. Subject to this objection, BellSouth has and does provide CLECs with mechanized firm order confirmations (FOCs), but it **does not** have a corresponding process for its own retail operations. An FOC is the CLEC's assurance that its order has successfully passed through the various edits and formatting checks in LEO, LESOG, and SOCs, and that the order is pending in SOCS. A completion notice (CN) is provided to a CLEC after a service order has been posted as "complete" in SOCS. BellSouth **does not** have a corresponding process for itself. For

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information regarding rejection and jeopardy notification, please see BellSouth's response to Data Request nos. 5,6 (First), 10, and 11. Also see BellSouth's response to nos. 8, 9, 12, and 13. (Emphasis provided.)

- (a.) Does AT&T agree with BellSouth's response? If not, please explain. Please be specific and provide as supporting documentation.

- 9. In response to Item 15 of the Consumer Advocate Division's first discovery request

BellSouth stated:

In response to Item no. 14, BellSouth admitted that it does not integrate the LENS pre-ordering and the EDI ordering interfaces for CLECs. Integration of the pre-ordering interfaces is the responsibility of each CLEC, if it desires integration; it is not BellSouth's responsibility. However, since the time of the Louisiana filing, and updated GCI specification for LENS has been made available to interested CLECs. The EC-LITE machine-to-machine pre-ordering interface, which may also be integrated with EDI, became available on December 31, 1997.

- (a.) Does AT&T agree with this response? If not, please explain. Please be specific and provide supporting documentation.

- (b.) Has AT&T integration of its pre-ordering interfaces? If not, please explain.

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10. Provide any analysis of the length of time between being notified by BellSouth that it will not be able to accomplish the cut over and the scheduled cut over date.
11. Provide any analysis that shows the number of times/ frequency of customers service being disconnected by BellSouth and you not being able to provide service to the customer due to BellSouth's problems. (Provide supporting documentation.)

Certificate of Service

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